

EXHIBIT F

FINDINGS CONCERNING INFEASIBILITY OF ALTERNATIVES

The California Environmental Quality Act ("CEQA"), Pub. Resources Code §21000, *et seq.*, provides that decision-makers should not approve a project as proposed if there are feasible alternatives or feasible mitigation measures that would substantially lessen the significant impacts of the project. (CEQA Section 21002). The Environmental Impact Report ("EIR") for the 1919 Williams Street Project identified feasible mitigation measures that would reduce several of the potentially significant impacts to less than significant. However, Cultural Resources Impact CUL-1 in the EIR will remain significant after mitigation (i.e., significant and unavoidable) and no feasible mitigation or project alternative is identified to reduce the impact to a less than significant level.

CEQA requires that an EIR "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project ..." (CEQA Guidelines Section 15126.6(a)). If a project alternative will avoid or substantially lessen the significant environmental effects of a proposed project, the decision-maker should not approve the proposed project unless it determines that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make the project alternative infeasible. (CEQA Sections 21002 and 21081(a)(3), and CEQA Guidelines Section 15091(a)(3).) The Board of Zoning Adjustments (BZA) hereby makes these findings with respect to alternatives.

The project objectives are set forth in Chapter 2 of the Draft EIR. Alternatives are identified and analyzed in Chapter 5 of the Draft EIR and include the required No Project Alternative and a Renovation of Existing Building Alternative. In identifying alternatives to the Project, primary consideration was given to alternatives that could reduce significant unavoidable impacts resulting from the Project. Each of the alternatives was assessed for each resource topic and compared to potential project impacts. As further described herein and supported by the administrative record for the project, the Board of Zoning Adjustments has considered the alternatives identified and analyzed in Chapter 5 of the Draft EIR and finds them to be infeasible for specific economic, social, or other considerations pursuant to CEQA Sections 21002 and 21081(a)(3), and CEQA Guidelines Section 15091(a)(3). For CEQA purposes, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. (CEQA Section 21061.1, CEQA Guidelines Section 15364.)

ALTERNATIVE SCREENED OUT FROM DETAILED CONSIDERATION IN THE EIR

The following alternative was considered but dismissed from further analysis because it would not fulfill most of the project objectives, would not eliminate or substantially lessen environmental effects, and/or would otherwise be infeasible:

- Relocation of the original 1952 portion of the building to another site in the City of San Leandro.

The City finds that this alternative eliminated from further consideration in the EIR is infeasible on the ground that it is not capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological or legal factors, or is inconsistent with City goals or policies, or would not meet important project objectives, or that it would not reduce or avoid any of the significant effects of the Project, for the reasons detailed in Section 5.3 of the Draft EIR which are incorporated herein by reference as well as all the facts and evidence in the record supporting the rationale.

ALTERNATIVES ANALYZED IN THE EIR

In compliance with CEQA and the CEQA Guidelines, the EIR evaluated a reasonable range of alternatives to the Project that were described in the EIR (DEIR Chapter 5.0) which are hereby incorporated by reference. The two alternatives analyzed in detail in the EIR represent a reasonable range of potentially feasible alternatives that reduce one or more significant impacts of the Project and/or provide decision makers with additional information about Project alternatives. The EIR also identified an environmentally superior alternative that was considered to have the least number of environmental impacts if implemented. The Board of Zoning Adjustments certifies that it has independently reviewed and considered the information on the alternatives provided in the EIR and in the record. The EIR reflects the Board of Zoning Adjustment's independent judgment as to alternatives.

The Board of Zoning Adjustments finds that specific economic, social, environmental, technological, legal or other considerations make infeasible certain alternatives to the Proposed Project – Alternative 1 No Project Alternative and Alternative 2 - Renovation of Existing Building Alternative for the reasons stated below. Each individual reason presented below constitutes a separate and independent basis to reject the Project alternative as being infeasible, and, when the reasons are viewed collectively, provide an overall basis for rejecting the alternative as being infeasible.

Alternative 1 – No Project Alternative.

CEQA Guidelines Section 15126.6(e) requires that a "No Project" alternative be evaluated as part of an EIR. Under the No Project Alternative, the proposed project would not be adopted. The No Project Alternative assumes that the proposed warehouse/office mixed-use building, parking lot, and other accessories associated with the proposed project would not be constructed. The No Project Alternative would fulfill two project objectives to maintain and protect the City's inventory of larger-scale industrial sites and to support and retain existing industrial uses and employment in the industrial sector. However, the other five project objectives would not be fulfilled compared to the proposed project since the No Project Alternative would not achieve economic benefit as the building on site is currently vacant and underutilized, create a modern warehouse that would contribute to the site's aesthetic, facilitate the evolution of a transforming industrial workplace, create a new efficient and updated warehouse, or encourage productive use of the City's industrial land. Furthermore, the property would likely remain in its current state of disrepair and continue to deteriorate.

Impacts. This Alternative would avoid all the significant impacts of the Project since no physical changes would occur at the site and existing types of uses would continue.

Findings. Pursuant to Public Resources Code section 21081(a)(3) and CEQA Guidelines section 15091(a)(3), based on the whole of the record, the Board of Zoning Adjustments finds that the specific economic, legal, social, technological, or other considerations, including failure to meet project objectives, render the No Project Alternative infeasible.

Since this Alternative does not meet nearly all of the Project Objectives, the Board of Zoning Adjustments rejects this Alternative as infeasible. Each of the aforementioned considerations is sufficient, both by itself and in combination with the other aforementioned considerations, to reject the No Project Alternative.

Alternative 2 - Renovation of the Existing Building Alternative.

Under the Renovation of the Existing Building Alternative ("Renovation Alternative"), the Project would involve demolition of the existing building at 1919 Williams Street, except for the historically eligible portion of the building. The 1952 portion of the building would be renovated and a modified version of the proposed project would be constructed around it. The building would be renovated in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties Guidelines (2017) to the extent feasible. This Renovation Alternative would achieve six of the project objectives, but not to the same degree as the proposed project as the size and utility of the building in this Renovation Alternative would be reduced. The overall size of the building under this

Renovation Alternative would be smaller than the proposed project and thus would not utilize the existing parcel to its full extent as it does not maximize the redevelopment potential of the site, and renovations of historic properties are more costly than new construction. As the existing building was custom designed for a parts supply company that does not lend well to other industrial uses, development of the building would be limited due to the constrained space. The current structure has limited interior spatial dimensions, including limited clearance and ceiling height. As such, the building cannot be renovated for another use and the renovation of the historic property would be more costly than new construction. The Board of Zoning Adjustments has considered the Renovation Alternative and declines to adopt it because it does not avoid or substantially lessen all of the project's significant and unavoidable impacts and is infeasible for the specific economic, social, and other considerations as described and supported by the administrative record for the project.

Findings. Pursuant to Public Resources Code section 21081(a)(3) and CEQA Guidelines section 15091(a)(3), based on the whole of the record, the Board of Zoning Adjustments finds that the specific economic, legal, social, technological, or other considerations, including failure to feasibly attain most of the basic objectives of the project, render Alternative 2: Renovation of the Existing Building Alternative infeasible.

The Board of Zoning Adjustments finds that this alternative would not feasibly achieve most of the basic project objectives and would implicate specific social and economic considerations. Furthermore, this alternative would not avoid the Project's significant and unavoidable impacts. Each of the aforementioned considerations is sufficient, both by itself and in combination with the other aforementioned considerations, for the BZA to reject Alternative 2: Renovation of the Existing Building Alternative.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

While the Board of Zoning Adjustments finds that the No Project Alternative is the environmentally superior alternative because it would avoid all of the significant environmental impacts of the development that would occur under the Project, the City also finds that the No Project Alternative is infeasible pursuant to Public Resources Code section 21081(a)(3) and CEQA Guidelines section 15091(a)(3) because it would not meet nearly all of the project objectives. CEQA Guidelines Section 15126.6(e)(2) requires that if the environmentally superior alternative is the no project alternative, the EIR shall identify an environmentally superior alternative among the other alternatives. Therefore, the EIR identified Alternative 2, Renovation of the Existing Building Alternative, as the environmentally superior alternative. As stated in the EIR, none of the other alternatives would be effective in eliminating the Project's significant and unavoidable impacts. The Renovation of

the Existing Building Alternative, is identified as the second most environmentally superior alternative from the remaining alternatives because the historically significant portion of the existing building would not be demolished, and the significant and unavoidable impact related to cultural resources would be avoided. In addition, impacts related to air quality, greenhouse gas emissions, noise, population and housing, public services, recreation, transportation, and tribal cultural resources would be similar to or reduced compared to impacts under the proposed project. Impacts related to energy would be increased compared to the proposed project due to the original portion of the building remaining on-site and continuing operation. Alternative 2 would also fulfill many of the project objectives, but not to the same degree as the proposed project, would not use the project site as efficiently, a key objective, would not utilize the existing parcel to its full extent, and would be more costly. Accordingly, the Renovation of the Existing Building Alternative is infeasible, as described above, because of specific economic, legal, social, technological, or other considerations, including failure to feasibly attain basic project objectives. For these reasons, both individually and independently, and in combination with each other, the Board of Zoning Adjustments rejects the environmentally superior alternative as infeasible.